

# TENNESSEE REGULATORY AUTHORITY

Deborah Taylor Tate, Chairman  
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460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

October 8, 2003

Ms. Patricia Childers  
Vice President of Rates and Regulatory Affairs  
Atmos Energy Corporation  
810 Crescent Centre Drive, Ste. # 600  
Franklin, TN 37067-6226

RE: Atmos Energy Corporation's Gas Transportation Contract with Goodyear Tire and Rubber Company-Docket No. 03-00540

Dear Ms. Childers:

Staff is currently reviewing the petition that was filed in connection with the special contract between Goodyear Tire and Rubber Company and Atmos Energy Corporation. In order to complete the review, we will need the following information. Please respond to this data request by October 22, 2003.

1. Collective Exhibit A contains a report from Kimball Resources, Inc. Provide the date of this report. In addition, provide a copy of the engagement letter between Kimball Resources, Inc. and Goodyear along with all other correspondence between the two parties related to the analysis of "alternate delivery mechanisms" to Goodyear.
2. Collective Exhibit A contains a letter from HT Engineering to Kimball Resources, Inc. Explain the relationship between Kimball Resources, Inc. and HT Engineering, Inc. In addition, provide a copy of the engagement letter and all other correspondence related to the analysis of "alternate delivery mechanisms" between Goodyear, Kimball Resources, Inc., and/or HT Engineering.
3. Provide a copy of Goodyear's Gas Supply Contract referred to on Page 1 of the Kimball Resources Report included in Collective Exhibit A.
4. Provide a copy of each of the enclosures referred to in the March 30, 2001 letter from HT Engineering, Inc. to Kimball Resources, Inc. contained in Collective Exhibit A.
5. Collective Exhibit A mentions that "Goodyear plants compete with other tire manufacturers as well as one another." It also mentions that "Goodyear shifts production to lower cost plants both domestically and internationally." Provide an analysis of the profitability for each of the Goodyear plants. In addition, provide an analysis of the projects that have been won and lost from/to other Goodyear plants by the Union City plant in the last five years.
6. The Kimball Resources, Inc. report included in Collective Exhibit A mentions that "Goodyear is exploring every cost containment opportunity, including consolidation of production and

resultant multi-plant closures." Provide an analysis of all other cost containment measures that Goodyear has undertaken at its Union City plant including renegotiated contracts with other vendors. Also provide an analysis of production consolidation and plant closures that Goodyear has implemented since the date of this report.

7. Provide the rate that Goodyear pays to gas utilities for local distribution service at each of its plants by month for the 12 months ended September 30, 2003.
8. Provide all correspondence between Goodyear and Atmos related to this Special Contract.
9. Provide all correspondence that either Goodyear, Goodyear's consultants, or Atmos has regarding any interstate pipelines and a direct connection to Goodyear's plant in Union City.
10. Provide a calculation of the contribution margin from sales to Goodyear under both existing and proposed rates under this Special Contract.
11. Provide an analysis of the gas sales/transportation volumes and associated revenues on gas deliveries to Goodyear by meter and by month for the last five years.

If you have any questions regarding this request, you may contact me at extension 174.

Sincerely,

*William H. Novak*

William H. Novak, Chief *With permission OK*  
Energy and Water Division